

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

**PURDUE PHARMA L.P., *et al.*,
Debtors.¹**

Chapter 11

Case No. 19-23649 (RDD)

(Jointly Administered)

DECLARATION OF GAUTAM GOWRISANKARAN

¹ The Debtors in these cases, along with the last four digits of each Debtor's registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF LP (0495), SVC Pharma LP (5717) and SVC Pharma Inc. (4014). The Debtors' corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

Pursuant to 28 U.S.C. § 1746, I, Gautam Gowrisankaran, hereby declare as follows under penalty of perjury:

1. On June 15, 2021, I submitted an expert report entitled the *Expert Report of Professor Gautam Gowrisankaran* (the “**Gowrisankaran Expert Report**”). JX-0525 – JX-0527 is a true and accurate copy of the Gowrisankaran Expert Report and appendices thereto. The Gowrisankaran Expert Report evaluates whether the opioid abatement programs funded by distributions under the Plan¹ provide value to claimants, including governmental claimants such as states, local, and tribal governments, and private claimants such as hospitals, treatment providers, third-party payors, and neonatal abstinence syndrome monitoring claimants.

2. Since June 15, 2021, I have reviewed updates to the Plan and the Plan Supplements. The updates to the Plan and Plan Supplements do not change any of the opinions expressed in the Gowrisankaran Expert Report. I reserve the right to revise my opinions in light of my ongoing review of materials, including data, documents, and depositions or other testimony that may subsequently come to light.

3. Since June 15, 2021, my curriculum vitae, which is attached to the Gowrisankaran Expert Report as Appendix A, has been updated. I attach hereto as Exhibit B the current, updated version of my curriculum vitae. JX-2767 is a true and accurate copy of my updated curriculum vitae.

¹ Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Debtors’ *Sixth Amended Joint Chapter 11 Plan of Reorganization of Purdue Pharma L.P. and Its Affiliated Debtors* [Dkt. No. 3185] (the “**Plan**”) or the *Fifth Amended Disclosure Statement for the Fifth Amended Joint Chapter 11 Plan of Reorganization of Purdue Pharma, L.P., et al., Pursuant to Chapter 11 of the Bankruptcy Code* [Docket No. 2983] (as may be subsequently supplemented, amended, or modified from time to time, the “**Disclosure Statement**”), as applicable.

4. In accordance with my understanding of paragraph 4.h of the *Third Amended Order Granting Debtors' Motion for Order Establishing Confirmation Schedule and Protocols* [Docket No. 3347], I respectfully submit this Declaration, the Gowrisankaran Expert Report attached hereto as Exhibit A, and my updated curriculum vitae attached hereto as Exhibit B as my direct testimony on behalf of the Debtors.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on: August 5, 2021

By: /s/ Gautam Gowrisankaran
Gautam Gowrisankaran